

A.4.1



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Road  
Twinsburg, OH 44087-1924

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

Bob Taft, Governor  
Bruce Johnson, Lieutenant Governor  
Joseph P. Koncelik, Director

**CERTIFIED MAIL**

May 1, 2006

Arthur S. Cooper  
260 Springside Drive  
Akron, OH 43333

RECEIVED

MAY 8 2006

Technical Support  
Waste Management  
Waste, Pesticides  
U.S. EPA Region 5

**RE: FINAL CLOSURE LETTER, FOR CLEAN CLOSURE BY MEETING OEPA/DHWM  
GENERIC CLEANUP NUMBER STANDARDS AND/OR BACKGROUND  
FLEXSYS AMERICA PROPERTY, OHD 071 112 239**

Dear Mr. Cooper:

On March 24, 2006, Ohio EPA received final closure certification documents from Arthur S. Cooper for Flexsys America. Arthur S. Cooper and Robert S. Ruse certified that Flexsys America has been closed according to the specifications discussed with the Northeast District Office (NEDO), Division of Hazardous Waste Management (DHWM). The type of closure was an unrestricted closure by demonstration of successful decontamination to below the Ohio EPA, DHWM Generic Cleanup Numbers (GCN), or, in the case of Arsenic, below established background levels.

To verify Flexsys America's closure activities, Bill Lutz, from Ohio EPA's Northeast District Office, conducted a final inspection of Flexsys America on March 29, 2006. He also reviewed documents pertaining to the closure of the facility and determined that the activities for the closure were conducted adequately.

Based on this inspection and review, Ohio EPA has determined that Flexsys America has met the facility's closure requirements. The facility's compliance with closure obligations under Ohio's hazardous waste laws does not discharge Flexsys America's obligation to investigate and possibly clean up contamination from releases of hazardous waste or hazardous constituents at the facility, regardless of when the waste was placed in the unit. This requirement is known as RCRA Corrective Action.

Flexsys America has completed final closure at the facility. Flexsys America will revert to the status of a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste.



FLEXSYS AMERICA  
FINAL CLOSURE LETTER  
PAGE 2 OF 2

If you have any questions concerning the closure process or the status of the facility, please contact Bill Lutz by phone at (330) 963-1245, or by mailing address at Ohio EPA, Northeast District Office, Attn: Bill Lutz, 2110 E. Aurora Road, Twinsburg, Ohio, 44087.

Sincerely,



Kurt M. Princic  
Environmental Manager  
Division of Hazardous Waste Management

KMP:ddw

cc: Pamela Allen, Manager, RISS, DHWM, CO  
Ed Lim, Manager, ERAS, DHWM, CO  
Harriet Croke, U.S. EPA, Region V

ec: Harry Sarvis, Manager, CAS, DHWM, CO  
Jeremy Carroll, Supervisor, ERAS, DHWM, CO  
Jeff Patzke, Manager, DDAGW, CO  
Bill Lutz, DHWM, NEDO  
John Palmer, DHWM, NEDO

# Monsanto

Monsanto Chemical Company  
800 N. Lindbergh Boulevard  
St. Louis, Missouri 63167  
Phone: (314) 694-1000

October 11, 1988

RECEIVED  
OCT 14 1988  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Ms. Anita Boseman 5HS-113  
Region V EPA  
230 South Dearborn  
Chicago, IL 60604

Dear Ms. Boseman:

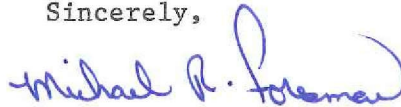
Re: Closure Plan  
Akron Market Research Center  
OHD 071 112 239

I received your letter dated September 16, 1988 and I have been unable to reach you or Mr. Bremer by telephone. As we discussed earlier this summer and detailed in my letter of June 29, 1988, the storage area in question was closed in January 1983 and a certification was forwarded to Ohio EPA. Additional information on the storage area is as follows:

1. The storage area was a small room (12' x 12') in a metal building behind the main facility.
2. The storage area was used for less than 90 day storage until disposal/shipping problems created a situation in 1982 where several drums were held over 90 days.
3. The storage area was closed in 1983 and a certification was forwarded to Ohio EPA.
4. The metal building and pad which contained the storage area was removed in 1984 as part of the expansion to the main research facility.

Please call me at 314/694-3289 and let's discuss how best to resolve this issue.

Sincerely,



Michael R. Foresman  
Manager, Environmental Protection

cc: Karl Bremer - Region V EPA  
Ed Kitchen - Ohio EPA

# Monsanto

RECEIVED

FEB 7 - 1983

OHIO ENVIRONMENTAL  
PROTECTION AGENCY  
N. E. D. O.

Monsanto Company  
280 Springside Drive  
Akron, Ohio 44313  
Phone: (216) 666-4111

February 1, 1983

Ohio Environmental Protection Agency  
Attn: Steven Tuckerman  
Northeast District Office  
2110 E. Aurora Road  
Twinsburg, Ohio 44087

Dear Mr. Tuckerman:

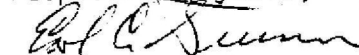
RE: CLOSURE PLAN AMENDMENT  
40 CFR Part 265.112

In response to your request for more information regarding the closure of our storage facility, I offer the following:

1. This storage facility was closed as of January 19, 1983. As you suggested, to qualify as a small generator, it was in our best interest to close this facility immediately. We did not go through a partial closure, nor do we intend to use this facility again.
2. Thirty-seven (37) drums of waste were removed from the storage area, which represented an accumulation from May 28, 1980. Of this total, nineteen (19) drums were packed with solid product, and eighteen (18) contained waste solvent.
3. Since all the waste was packaged in steel drums, and there were no leaks or spills, decontamination of the area was not necessary. However, in case we did have a problem, the floor was treated with a silicone cement sealant, which would have simplified a clean-up process.
4. None of the other several references, appearing in Section 265.112, apply to our storage facility.

If any further action is required in this matter, please advise.

Respectfully yours,



Earl C. Guinn

ECG:tr

James A. Titmas and Associates, Incorporated  
P.O. Box 2333 • Streetsboro, Ohio 44224

20 Jan 83

Monsanto Industrial Chemicals Co.  
260 Springside Drive  
Akron, Ohio 44313

Attn: Mr. Earl Guinn

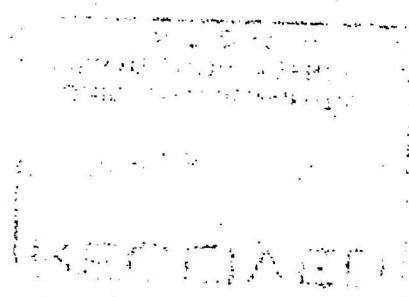
In re: Closure Plan

Gentlemen:

On January 20th 1983 the writer personally inspected the address  
premis and certifies compliance with the requirement for removal of all  
accumulated wastes from the drum storage area as specified in the Ohio  
E.P.A. correspondence dated 22 December 1982. This certification applies to  
the Monsanto Closure Plan of January 21st 1983.

Very truly yours,

James A. Titmas, PE  
President





SEP 16 1988

5HR-13

Mike Foresman, Manager  
Monsanto Company  
Akron Market Research Center  
260 Springside Drive  
Akron, Ohio 44313

Re: Submittal of Closure Plan  
Akron Market Research Center  
OHD 071 112 239

Dear Mr. Foresman:

This letter is in response to your letter of July 5, 1988, requesting a change of status for the above-referenced facility. The request stated the facility would like to be considered a generator of hazardous waste only, and accumulate those wastes on-site for fewer than 90 days, in accordance with 40 CFR §262.34.

Your letter indicated that your facility operated as a regulated storage area from November 1980 to January 1983. Therefore, the facility is subject to the closure requirements in 40 CFR §265, Subpart G, and to the Hazardous and Solid Waste Amendments of 1984.

Two copies of the closure plan should be submitted to each of the following offices:

RCRA Activities  
United States Environmental Protection Agency  
Region V  
Post Office Box A-3587  
Chicago, Illinois 60690-3582

Ohio Environmental Protection Agency  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087

Technical Assistance & Engineering Section  
Division of Solid & Hazardous Waste Management  
Ohio Environmental Protection Agency  
Post Office Box 1049  
Columbus, Ohio 43266-1049

-2-

If you have any questions, please contact Anita L. Boseman, of my staff, at (312) 353-4734.

Sincerely,

ORIGINAL SIGNED BY/  
KARL E. BREMER

Karl E. Bremer, Chief  
RCRA Permitting Branch

cc: Ed Kitchen, OEPA  
Dave Wertz, OEPA-NEDO  
Tony Sasson, OEPA

5HR:BOSEMAN:pb:9/9/88

Disk #1

20  
9-14-88

| RCRA<br>PERMITS | TYP.    | AUTH.   | IL.<br>CHIEF | IN.<br>CHIEF | MI.<br>CHIEF | MN/WI<br>CHIEF | OH.<br>CHIEF | RPB<br>CHIEF | O.R.<br>A.D.D. | WMD<br>DIR |
|-----------------|---------|---------|--------------|--------------|--------------|----------------|--------------|--------------|----------------|------------|
| INIT.<br>DATE   | 9/13/88 | 9/13/88 |              |              |              |                | 9/13/88      | 9/14/88      |                |            |

A.4.5



OHD 07112239

# Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO.

Sauget, Illinois 62201

Phone: (618) 271-5835

August 4, 1983

Regional Administrator  
Environmental Protection Agency  
230 South Dearborn  
Chicago, IL 60604

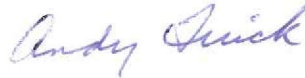
Attn: RCRA Financial Requirements

Dear Sir:

Recently we received notices from the Springfield, Illinois office of the Illinois EPA that the W. G. Krummrich Plant (ILD000802702 and ILD 000722074) was in violation for failing to submit "required financial assurances to the Illinois Environmental Protection Agency". Further, G. Perry of the Springfield office informed that the US EPA Region V office had supplied the list of "violators" among which was the W. G. Krummrich Plant. Our records indicate that this is a mistake. Attached are copies of financial assurance statements for ILD000802702 that were sent to your office in 1982 and 1983. A financial assurance letter for ILD 000722074 (W. G. Krummrich Plant River Terminal) was not submitted because this facility has never received or generated hazardous waste for treatment, storage, or disposal (see 40 CFR 264.143 (f)(4)).

It is our opinion that the attached documents fulfill our responsibility to provide statements of financial assurance to comply with RCRA and all other regulatory requirements. Should there remain any problems or questions, please contact me at the above address or by phone at (618) 271-5835 Extension 2271.

Sincerely,



A. J. Quick

AJQ/jc  
Attachment

RECEIVED  
AUG 10 1983

WASTE MANAGEMENT  
BRANCH



# Monsanto

Monsanto Company  
800 N. Lindbergh Boulevard  
St. Louis, Missouri 63167  
Phone: (314) 694-1000

March 31, 1983

RECEIVED  
MAY 1983  
WASTE MANAGEMENT  
BRANCH

Regional Administrator, Region V  
Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Illinois 60604

Gentlemen:

Enclosed is Monsanto Company's letter to demonstrate financial responsibility for liability coverage, closure and post-closure costs, which has been signed by the Chief Financial Officer.

Please contact me (telephone 314-694-7751) if you have additional questions regarding the financial requirements. Other questions should be referred to Mr. G. L. Jessee, Regulatory Management Director, RCRA (telephone 314-694-8887).

Sincerely,

Curtis D. Shartz  
Coordinator, Governmental  
Reporting

Enclosure

dar/16/N

Ten Broadway  
Saint Louis, Missouri 63102  
(314) 231-1123  
Telex 447638

Monsanto Company  
800 North Lindbergh Boulevard  
Saint Louis, Missouri 63167

March 22, 1983

Dear Sirs:

We have examined the consolidated financial statements of Monsanto Company and subsidiaries for the year ended December 31, 1982 and have issued our report thereon dated February 25, 1983. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. We have not performed any auditing procedures beyond the date of our opinion on the financial statements; accordingly, this report is based on our knowledge as of that date and should be read with this understanding.

At your request, we have performed the procedures enumerated below with respect to the accompanying letter from Mr. Francis A. Stroble to the Regional Administrator - Environmental Protection Agency dated March 18, 1983. It is understood that this report is solely for filing with the Environmental Protection Agency in accordance with requirements of the Resource Conservation and Recovery Act, and is not to be used for any other purpose. The procedures that we performed are summarized as follows:

1. We compared the amounts included in items 7 and 8 under the caption Financial Test - Alternative I in the letter referred to above with the corresponding amounts in the financial statements referred to in the first paragraph.
2. We recomputed from, or reconciled to, the financial statements referred to in the first paragraph the information included in items 4, 5, 6, 9, 10 and 11 under the caption Financial Test - Alternative I in the letter referred to above.

Because the procedures referred to in the preceding paragraph were not sufficient to constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the information or amounts

listed under the caption Financial Test - Alternative I in the  
aforementioned letter. In performing the procedures referred  
to above, however, no matters came to our attention that  
caused us to believe that the information or amounts included  
in items 4-11 should be adjusted.

Yours truly,

*Deloitte Haskins & Sells*

# Monsanto

FRANCIS A. STROBLE  
Senior Vice President  
and Chief Financial Officer

Monsanto Company  
800 N. Lindbergh Boulevard  
St. Louis, Missouri 63167  
Phone: (314) 694-3092

March 18, 1983

Regional Administrator, Region V  
Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Illinois 60604

Att: RCRA Financial Requirements

Gentlemen:

I am the chief financial officer of Monsanto Company, 800 North Lindbergh Boulevard, St. Louis, Missouri 63167. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care, as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

| <u>EPA Facility<br/>I.D. No.</u> | <u>Name of Facility</u>               | <u>Address of Facility</u>   |
|----------------------------------|---------------------------------------|--|
| AR D 001700657                   | Monsanto Company<br>El Dorado Plant   | P.O. Box 231<br>El Dorado, Arkansas 71730  |
| AL D 004019048                   | Monsanto Company<br>Anniston Plant    | Highway 202<br>West 10th Street<br>Anniston, Alabama 36202                             |
| MO D 990712697                   | Monsanto Company<br>St. Peters Plant  | P.O. Box 8<br>St. Peters, Missouri 63376   |
| CA O 063566517                   | Monsanto Company<br>Oakmead Plant     | Oakmead Industrial Court<br>3350 Scott Blvd., Bldg. 1<br>Santa Clara, California 95051 |
| SC D 000419200                   | Monsanto Company<br>Spartanburg Plant | Box 5397<br>Spartanburg, South Carolina 29301  |



| <u>EPA Facility<br/>I.D. No.</u> | <u>Name of Facility</u>                              | <u>Address of Facility</u>   |
|----------------------------------|--|--|
| TN D 00404814                    | Monsanto Company<br>Columbia Plant                   | Columbia, Tennessee 38401  |
| NC D 088563242                   | Monsanto Company<br>Fayetteville Plant               | Cedar Creek Road<br>Fayetteville,<br>North Carolina 28302            |
| MO D 004954111                   | Monsanto Company<br>J. F. Queeny Plant               | 1700 South Second Street<br>St. Louis, Missouri 63177                |
| IL D 000802702                   | Monsanto Company<br>W. G. Krummrich Plant            | Route 3<br>Sauget, Illinois 62201                                    |
| TX D 001700806                   | Monsanto Company<br>Chocolate Bayou Plant            | Box 711<br>Alvin, Texas 77511  |
| TX D 008079527                   | Monsanto Company<br>Texas City Plant                 | P.O. Box 1311<br>Texas City, Texas 77590                             |
| GA D 001700699                   | Monsanto Company<br>Augusta Georgia Plant            | Marvin Griffin Road<br>P.O. Box 1473<br>Augusta, Georgia 30903       |
| NJ D 001700830                   | Monsanto Company<br>Camden Plant                     | 1500 Pine Street<br>Camden, New Jersey 08103                         |
| MO D 000006981                   | Monsanto Company<br>Carondelet Plant                 | 8201 Idaho Avenue<br>St. Louis, Missouri 63111                       |
| NJ D 001700707                   | Monsanto Company<br>Delaware River Plant             | P.O. Box 296<br>Bridgeport, New Jersey 08104                         |
| MA D 990894172                   | Monsanto Company<br>Everett Plant                    | Mystic View Road<br>Everett, Massachusetts 02149                     |
| NJ D 002444933                   | Monsanto Company<br>Kearny Plant                     | Pennsylvania Avenue<br>Kearny, New Jersey 07032                      |
| OH D 071112239                   | Monsanto Company<br>Montrose Mktg. &<br>Tech. Center | 260 Springside Drive<br>Box 5444<br>Akron, Ohio 44313                |
| CA D 003938487                   | Monsanto Company<br>Long Beach Plant                 | 6251 Paramount Boulevard<br>Box 2919<br>Long Beach, California 90801 |
| WV D 039990965                   | Monsanto Company<br>Nitro Plant                      | Nitro<br>West Virginia 25143   |
| WA D 009282302                   | Monsanto Company<br>Seattle Plant                    | 9229 East Marginal Way S.<br>Box 80963<br>Seattle, Washington 98108  |

| <u>EPA Facility<br/>I.D. No.</u> | <u>Name of Facility</u>                  | <u>Address of Facility</u>                                       |
|----------------------------------|--|--|
| MI D 009708678                   | Monsanto Company<br>Trenton Plant        | 5045 West Jefferson<br>Trenton, Michigan 48183                   |
| OH D 004233003                   | Monsanto Company<br>Port Plastics Plant  | River Road<br>Addyston, Ohio 45001                               |
| MA D 041492406                   | Monsanto Company<br>West Plant           | 190 Grochmal Avenue<br>Indian Orchard, Massachusetts 01151       |
| MA D 001114818                   | Monsanto Company<br>East Plant           | 730 Worcester Street<br>Indian Orchard, Massachusetts 01151      |
| MI D 074246919                   | Monsanto Company<br>Trenton Resins Plant | 5100 West Jefferson<br>Trenton, Michigan 48183                   |
| AL D 006320774                   | Monsanto Company<br>Decatur Plant        | P.O. Box 2204<br>Decatur, Alabama 35602                          |
| FL D 000126169                   | Monsanto Company<br>Pensacola Plant      | P.O. Box 12830<br>Pensacola, Florida 32575                       |
| SC D 000419069                   | Monsanto Company<br>Greenwood Plant      | P.O. Box 1057<br>Greenwood, South Carolina 29646                 |
| MO D 006266803                   | Monsanto Company Research<br>Center      | 800 North Lindbergh<br>St. Louis, Missouri 63166                 |
| NC D 042891481                   | Monsanto Company<br>Triangle Park        | P.O. Box 12274<br>Research Triangle Park<br>North Carolina 27709 |

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

| <u>EPA Facility<br/>I.D. No.</u> | <u>Facility</u>   | <u>Closure Cost<br/>Estimate</u><br>(Dollars in Thousands) | <u>Post-<br/>Closure Cost<br/>Estimate</u> |
|----------------------------------|---|--|--|
| OH D 004233003                   | Monsanto Company<br>Port Plastics Plant<br>River Road<br>Addyston, Ohio 45001 | \$ 62  | \$ 0                                       |

| EPA Facility<br>I.D. No. | Facility   | Closure Cost<br>Estimate<br>(Dollars in | Post-<br>Closure Cost<br>Estimate<br>Thousands) |
|--------------------------|--|---|---|
| OH D 071112239           | Monsanto Company<br>Montrose Mktg. & Tech. Ctr.<br>260 Springside Drive<br>Box 5444<br>Akron, Ohio 44313 | \$ 3                                    | \$ 0  |
| MI D 074246919           | Monsanto Company<br>Trenton Resins Plant<br>5100 West Jefferson<br>Trenton, Michigan 48183               | 8                                       | 0   |
| MI D 009708678           | Monsanto Company<br>Trenton Plant<br>5045 West Jefferson<br>Trenton, Michigan 48183                      | 222                                     | 660   |
| MO D 006266803           | Monsanto Company<br>Research Center<br>800 North Lindbergh<br>St. Louis, Missouri 63166                  | 50                                      | 0   |
| MO D 000006981           | Monsanto Company<br>Carondelet Plant<br>8201 Idaho Avenue<br>St. Louis, Missouri 63111                   | 21                                      | 0   |
| MO D 990712697           | Monsanto Company<br>St. Peters Plant<br>P.O. Box 8<br>St. Peters, Missouri 63376                         | 86                                      | 0   |
| MO D 004954111           | Monsanto Company<br>J. F. Queeny Plant<br>1700 South Second Street<br>St. Louis, Missouri 63177          | 435                                     | 0   |
| NJ D 001700707           | Monsanto Company<br>Delaware River Plant<br>P.O. Box 296<br>Bridgeport, New Jersey 08104                 | 826                                     | 494   |
| NJ D 001700830           | Monsanto Company<br>Camden Plant<br>1500 Pine Street<br>Camden, New Jersey 08103                         | 8                                       | 0   |
| NJ D 002444933           | Monsanto Company<br>Kearny Plant<br>Pennsylvania Avenue<br>Kearny, New Jersey 07032                      | 3                                       | 0   |

| <u>EPA Facility<br/>I.D. No.</u> | <u>Facility</u>  | <u>Closure Cost<br/>Estimate</u><br>(Dollars in | <u>Post-<br/>Closure Cost<br/>Estimate</u><br>Thousands) |
|----------------------------------|--|---|--|
| WA D 009282302                   | Monsanto Company<br>Seattle Plant<br>9229 East Marginal Way South<br>Box 80963<br>Seattle, Washington 98108  | \$ 27   | \$ 0   |
| WV D 039990965                   | Monsanto Company<br>Nitro Plant<br>Nitro, West Virginia 25143  | 3,357   | 0  |
| FL D 000126169                   | Monsanto Company<br>Pensacola Plant<br>P. O. Box 12830<br>Pensacola, Florida 32575                           | 3,224   | 0  |
| TX D 001700806                   | Monsanto Company<br>Chocolate Bayou Plant<br>Box 711<br>Alvin, Texas 77511                                   | 1,795   | 1,189  |
| TX D 008079527                   | Monsanto Company<br>Texas City Plant<br>P. O. Box 1311<br>Texas City, Texas 77590                            | 677   | 92   |
| GA D 001700699                   | Monsanto Company<br>Augusta Georgia Plant<br>Marvin Griffin Road<br>P. O. Box 1473<br>Augusta, Georgia 30903 | 20  | 0  |
| SC D 000419069                   | Monsanto Company<br>Greenwood Plant<br>P. O. Box 1057<br>Greenwood, South Carolina 29646                     | 10  | 0  |
| SC D 000419200                   | Monsanto Company<br>Spartanburg Plant<br>Box 5397<br>Spartanburg, South Carolina 29301                       | 14  | 0  |
| AL D 004019048                   | Monsanto Company<br>Anniston Plant<br>Highway 202<br>West 10th Street<br>Anniston, Alabama 36202             | 388   | 795  |



| EPA Facility<br>I.D. No. | Facility   | Closure Cost<br>Estimate<br>(Dollars in Thousands) | Post-<br>Closure Cost<br>Estimate |
|--------------------------|--|--|-----------------------------------|
| AL D 006320774           | Monsanto Company<br>Decatur Plant<br>P. O. Box 2204<br>Decatur, Alabama 35602  | \$ 77  | \$ 0                              |
| AR D 001700657           | Monsanto Company<br>El Dorado Plant<br>P.O. Box 231<br>El Dorado, Arkansas 71730   | 99   | 32                                |
| CA D 003938487           | Monsanto Company<br>Long Beach Plant<br>6251 Paramount Boulevard<br>Box 2919<br>Long Beach, California 90801               | 5  | 0                                 |
| NC D 088563242           | Monsanto Company<br>Cedar Creek Road<br>Fayetteville,<br>North Carolina 28302  | 10   | 0                                 |
| CA O 063566517           | Monsanto Company<br>Oakmead Plant<br>Oakmead Industrial Court<br>3350 Scott Blvd., Bldg.1<br>Santa Clara, California 95051 | 1  | 0                                 |
| MA D 990894172           | Monsanto Company<br>Everett Plant<br>Mystic View Road<br>Everett, Massachusetts 02149                                      | 5  | 0                                 |
| IL D 000802702           | Monsanto Company<br>W. G. Krummrich Plant<br>Route 3<br>Sauget, Illinois 62201   | 2,066  | 0                                 |
| MA D 041492406           | Monsanto Company<br>West Plant<br>190 Grochnal Avenue<br>Indian Orchard,<br>Massachusetts 01151                            | 30   | 0                                 |
| MA D 001114818           | Monsanto Company<br>East Plant<br>730 Worcester Street<br>Indian Orchard,<br>Massachusetts 01151                           | 100  | 0                                 |

| EPA Facility<br>I.D. No. | Facility  | Closure Cost<br>Estimate<br>(Dollars in Thousands) | Post-<br>Closure Cost<br>Estimate |
|--------------------------|---|--|-----------------------------------|
| TN D 00404814            | Monsanto Company<br>Columbia Plant<br>Columbia, Tennessee 38401   | \$ 33  | \$ 250                            |
| NC D 042891481           | Monsanto Company<br>Triangle Park<br>P. O. Box 12274<br>Research Triangle Park,<br>North Carolina 27709 | 35   | 0                                 |

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

| EPA Facility<br>I.D. No.        | Facility  | Closure Cost<br>Estimate<br>(Dollars in Thousands) | Post-<br>Closure Cost<br>Estimate |
|---------------------------------|---|--|-----------------------------------|
| OH D 004855292 <sup>PAC</sup> ✓ | Monsanto Research Corp.<br>P.O. Box 8, Station B<br>Dayton, Ohio 45407  | \$ 42  | \$ 0                              |
| IA D 005287768                  | Fisher Controls Int'l., Inc.<br>Marshalltown Division<br>Governor Road Plant<br>P. O. Box 190<br>Marshalltown, Iowa 50158 | 10   | 0                                 |

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

NONE

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility.

| <u>EPA Facility<br/>I.D. No.</u> | <u>Facility</u>  | <u>Closure Cost<br/>Estimate</u><br>(Dollars in | <u>Post-<br/>Closure Cost<br/>Estimate</u><br>Thousands) |
|----------------------------------|--|---|--|
| IA D 990782112                   | Monsanto Company<br>Muscatine Plant<br>R.R. #5<br>Muscatine, Iowa 52761      | \$ 140  | \$ 0   |
| LA D 001700756                   | Monsanto Company<br>Luling Plant<br>P. O. Box 174<br>Luling, Louisiana 70070 | 2,708   | 678  |

This owner or operator is required to file a Form 10-K with the Securities and Exchange Commission (SEC) for the latest fiscal year.


The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk (\*) are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1982.

FINANCIAL TEST  
ALTERNATIVE I  
(Dollars in Millions)

|  |                 |
|--|-----------------|
| 1. Sum of current closure and post-closure cost estimates  | <u>\$ 20.8</u>  |
| 2. Amount of annual aggregate liability coverage to be<br>be demonstrated  | <u>\$ 8.0</u>   |
| 3. Sum of lines 1 and 2  | <u>\$ 28.8</u>  |
| * 4. Total liabilities (closure and post-closure costs<br>estimates included in total liabilities are de-<br>ducted from this line and added to lines 5 and 6) | <u>\$ 2,474</u> |
| * 5. Tangible net worth  | <u>\$ 3,463</u> |
| * 6. Net worth   | <u>\$ 3,494</u> |
| * 7. Current assets  | <u>\$ 2,454</u> |
| * 8. Current liabilities   | <u>\$ 951</u>   |
| 9. Net working capital (line 7 minus line 8)   | <u>\$ 1,503</u> |
| *10. The sum of net income plus depreciation, depletion,<br>and amortization.  | <u>\$ 791</u>   |
| *11. Total assets in U.S. (required only if less than 90%<br>of assets are located in the U.S.)  | <u>\$ 4,926</u> |

|   | <u>YES</u> | <u>NO</u> |
|---|------------|-----------|
| 12. Is line 5 at least \$10 million?  | <u>X</u>   | _____     |
| 13. Is line 5 at least 6 times line 3?  | <u>X</u>   | _____     |
| 14. Is line 9 at least 6 times line 3?  | <u>X</u>   | _____     |
| *15. Are at least 90% of assets located in the U.S.?<br>If not, complete line 16. | _____      | <u>X</u>  |
| 16. Is line 11 at least 6 times line 3?   | <u>X</u>   | _____     |
| 17. Is line 4 divided by line 6 less than 2.0?                                    | <u>X</u>   | _____     |
| 18. Is line 10 divided by line 4 greater than 0.1?                                | <u>X</u>   | _____     |
| 19. Is line 7 divided by line 8 greater than 1.5?                                 | <u>X</u>   | _____     |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (g) as such regulations were constituted on the date shown immediately below.

  
 Francis A. Stroble  
 Senior Vice President and  
 Chief Financial Officer  
 March 18, 1983

Ten Broadway  
Saint Louis, Missouri 63102  
(314) 231-1123  
Telex 447638

Monsanto Company  
800 North Lindbergh Boulevard  
Saint Louis, Missouri 63167

June 23, 1982

Dear Sirs:

We have examined the consolidated financial statements of Monsanto Company and subsidiaries for the year ended December 31, 1981 and have issued our report thereon dated February 26, 1982. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we compared the amounts specified in Mr. Francis A. Stroble's letter of June 17, 1982 as having been derived from the "independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1981" (the "specified amounts") with the corresponding amounts in the financial statements referred to in the preceding paragraph. In performing this procedure, no matters came to our attention that caused us to believe that the specified amounts should be adjusted.

Because this procedure would not constitute an examination in accordance with generally accepted auditing standards, we do not express an opinion on the specified amounts. In addition, we have performed no procedures with respect to any of the other information included in Mr. Francis A. Stroble's letter of June 17, 1982 and, accordingly, we express no opinion with respect to such information.

This report is submitted to you for your filing with the Regional Administrators of the Environmental Protection Agency under the Resource Conservation Recovery Act.

Yours truly,

*Deloitte Haskins + Sells*

# Monsanto

FRANCIS A. STROBLE  
Vice President-Finance  
& Chief Financial Officer

Monsanto Company  
800 N. Lindbergh Boulevard  
St. Louis, Missouri 63167  
Phone: (314) 694-3092

June 17, 1982

Regional Administrator, Region V  
Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Illinois 60604

Att: RCRA Financial Requirements

Gentlemen:

I am the chief financial officer of Monsanto Company, 800 North Lindbergh Boulevard, St. Louis, Missouri 63167. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care, as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

| <u>EPA Facility<br/>I.D. No.</u> | <u>Name of Facility</u>              | <u>Address of Facility</u>                                 |
|----------------------------------|--------------------------------------|--|
| AR D 001700657                   | Monsanto Company<br>El Dorado Plant  | P.O. Box 231<br>El Dorado, Arkansas 71730                  |
| LA D 001700756                   | Monsanto Company<br>Luling Plant     | P.O. Box 174<br>Luling, Louisiana 70070                    |
| IA D 990782112                   | Monsanto Company<br>Muscatine Plant  | R.R. #5<br>Muscatine, Iowa 52761                           |
| AL D 004019048                   | Monsanto Company<br>Anniston Plant   | Highway 202<br>West 10th Street<br>Anniston, Alabama 36202 |
| MO D 990712697                   | Monsanto Company<br>St. Peters Plant | P.O. Box 8<br>St. Peters, MO 63376                         |



| <u>EPA Facility<br/>I.D. No.</u> | <u>Name of Facility</u>                              | <u>Address of Facility</u>   |
|----------------------------------|--|--|
| CA O 063566517                   | Monsanto Company<br>Oakmead Plant                    | Oakmead Industrial Court<br>3350 Scott Blvd., Bldg. 1<br>Santa Clara, CA 95051 |
| SC D 000419200                   | Monsanto Company<br>Spartanburg Plant                | Box 5397<br>Spartanburg, SC 29301  |
| TN D 00404814                    | Monsanto Company<br>Columbia Plant                   | Columbia, Tennessee 38401  |
| CA D 990802738                   | Monsanto Company<br>Avon Plant                       | 1777 Monsanto Way<br>Martinez, California 94553                                |
| MO D 004954111                   | Monsanto Company<br>J. F. Queeny Plant               | 1700 South Second Street<br>St. Louis, Missouri 63177                          |
| ✓ IL D 000802702                 | Monsanto Company<br>W. G. Krummrich Plant            | Route 3<br>Sauget, Illinois 62201  |
| TX D 001700806                   | Monsanto Company<br>Chocolate Bayou Plant            | Box 711<br>Alvin, Texas 77511  |
| TX D 008079527                   | Monsanto Company<br>Texas City Plant                 | P.O. Box 1311<br>Texas City, Texas 77590                                       |
| GA D 001700699                   | Monsanto Company<br>Augusta Georgia Plant            | Marvin Griffin Road<br>P.O. Box 1473<br>Augusta, Georgia 30903                 |
| NJ D 001700830                   | Monsanto Company<br>Camden Plant                     | 1500 Pine Street<br>Camden, New Jersey 08103                                   |
| MO D 000006981                   | Monsanto Company<br>Carondelet Plant                 | 8201 Idaho Avenue<br>St. Louis, Missouri 63111                                 |
| NJ D 001700707                   | Monsanto Company<br>Delaware River Plant             | P.O. Box 296<br>Bridgeport, New Jersey   |
| MA D 990894172                   | Monsanto Company<br>Everett Plant                    | Mystic View Road<br>Everett, Maine 02149                                       |
| NJ D 002444933                   | Monsanto Company<br>Kearny Plant                     | Pennsylvania Avenue<br>Kearny, New Jersey 07032                                |
| ✓ OH D 071112239                 | Monsanto Company<br>Montrose Mktg. &<br>Tech. Center | 260 Springside Drive<br>Box 5444<br>Akron, Ohio 44313                          |
| CA D 003938487                   | Monsanto Company<br>Long Beach Plant                 | 6251 Paramount Boulevard<br>Box 2919<br>Long Beach, CA 90801                   |



| <u>EPA Facility<br/>I.D. No.</u> | <u>Name of Facility</u>                  | <u>Address of Facility</u>  |
|----------------------------------|--|---|
| WV D 039990965                   | Monsanto Company<br>Nitro Plant          | Nitro<br>West Virginia 25143  |
| WA D 009282302                   | Monsanto Company<br>Seattle Plant        | 9229 East Marginal Way S.<br>Box 80963<br>Seattle, Washington 98108 |
| ✓ MI D 009708678                 | Monsanto Company<br>Trenton Plant        | 5045 West Jefferson<br>Trenton, Michigan 48183                      |
| ✓ OH D 004233003                 | Monsanto Company<br>Port Plastics Plant  | River Road<br>Addyston, Ohio 45001                                  |
| MA D 041492406                   | Monsanto Company<br>Bircham Bend Plant   | 190 Grochmal Avenue<br>Indian Orchard, MA 01151                     |
| MA D 001114818                   | Monsanto Company<br>Springfield Plant    | 730 Worcester Street<br>Indian Orchard, MA 01151                    |
| ✓ MI D 074246919                 | Monsanto Company<br>Trenton Resins Plant | 5100 West Jefferson<br>Trenton, Michigan 48183                      |
| AL D 006320774                   | Monsanto Company<br>Decatur Plant        | P.O. Box 2204<br>Decatur, Alabama 35602                             |
| FL D 000126169                   | Monsanto Company<br>Pensacola Plant      | P.O. Box 12830<br>Pensacola, Florida 32575                          |
| SC D 000419069                   | Monsanto Company<br>Greenwood Plant      | P.O. Box 1057<br>Greenwood, SC 29646                                |
| MO D 006266803                   | Monsanto Company Research<br>Center      | 800 North Lindbergh<br>St. Louis, Missouri 63166                    |

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

| <u>EPA Facility<br/>I.D. No.</u> | <u>Facility</u>  | <u>Closure Cost<br/>Est. as of<br/>May 19, 1982</u><br>(Dollars in | <u>Post-<br/>Closure Cost<br/>Est. as of<br/>May 19, 1982</u><br>Thousands) |
|----------------------------------|--|--|---|
| ✓ OH D 004233003                 | Monsanto Company<br>Port Plastics Plant<br>River Road<br>Addyston, Ohio 45001                            | \$ 62  | \$ 0  |
| ✓ OH D 071112239                 | Monsanto Company<br>Montrose Mktg. & Tech. Ctr.<br>260 Springside Drive<br>Box 5444<br>Akron, Ohio 44313 | 3  | 0   |
| LA D 001700756                   | Monsanto Company<br>Luling Plant<br>P. O. Box 174<br>Luling, La 70070                                    | 2,695  | 691   |
| ✓ MI D 074246919                 | Monsanto Company<br>Trenton Resins Plant<br>5100 West Jefferson<br>Trenton, MI 48183                     | 8  | 0   |
| ✓ MI D 009708678                 | Monsanto Company<br>Trenton Plant<br>5045 West Jefferson<br>Trenton, MI 48183                            | 225  | 1188  |
| MO D 006266803                   | Monsanto Company<br>Research Center<br>800 North Lindbergh<br>St. Louis, MO 63166                        | 50   | 0   |
| MO D 000006981                   | Monsanto Company<br>Carondelet Plant<br>8201 Idaho Avenue<br>St. Louis, MO 63111                         | 21   | 0   |
| MO D 990712697                   | Monsanto Company<br>St. Peters Plant<br>P.O. Box 8<br>St. Peters, MO 63376                               | 86   | 0   |
| MO D 004954111                   | Monsanto Company<br>J. F. Queeny Plant<br>1700 South Second Street<br>St. Louis, MO 63177                | 414  | 0   |
| NJ D 001700707                   | Monsanto Company<br>Delaware River Plant<br>P.O. Box 296<br>Bridgeport, NJ                               | 826  | 494   |

| EPA Facility<br>I.D. No. | Facility  | Closure Cost<br>Est. as of<br>May 19, 1982<br>(Dollars in Thousands) | Post-<br>Closure Cost<br>Est. as of<br>May 19, 1982<br>(Dollars in Thousands) |
|--------------------------|---|--|---|
| NJ D 001700830           | Monsanto Company<br>Camden Plant<br>1500 Pine Street<br>Camden, NJ 08103                                | \$ 7   | \$ 0  |
| NJ D 002444933           | Monsanto Company<br>Kearny Plant<br>Pennsylvania Avenue<br>Kearny, NJ 07032                             | 3  | 0   |
| WA D 009282302           | Monsanto Company<br>Seattle Plant<br>9229 East Marginal Way South<br>Box 80963<br>Seattle, WA 98108     | 27   | 0   |
| WV D 039990965           | Monsanto Company<br>Nitro Plant<br>Nitro, WV 25143  | 3,090  | 0   |
| FL D 000126169           | Monsanto Company<br>Pensacola Plant<br>P. O. Box 12830<br>Pensacola, FL 32575                           | 3,224  | 0   |
| TX D 001700806           | Monsanto Company<br>Chocolate Bayou Plant<br>Box 711<br>Alvin, TX 77511                                 | 1,667  | 1,104   |
| TX D 008079527           | Monsanto Company<br>Texas City Plant<br>P. O. Box 1311<br>Texas City, TX 77590                          | 662  | 90  |
| GA D 001700699           | Monsanto Company<br>Augusta Georgia Plant<br>Marvin Griffin Road<br>P. O. Box 1473<br>Augusta, GA 30903 | 20   | 0   |
| SC D 000419069           | Monsanto Company<br>Greenwood Plant<br>P. O. Box 1057<br>Greenwood, SC 29646                            | 10   | 0   |
| SC D 000419200           | Monsanto Company<br>Spartanburg Plant<br>Box 5397<br>Spartanburg, SC 29301                              | 1  | 0   |

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

| <u>EPA Facility<br/>I.D. No.</u> | <u>Facility</u>  | <u>Closure Cost<br/>Est. as of<br/>May 19, 1982</u> | <u>Post-<br/>Closure Cost<br/>Est. as of<br/>May 19, 1982</u> |
|----------------------------------|--|---|---|
| (Dollars in Thousands)           |  |   |   |
| OH D 004855292                   | Monsanto Research Corp.<br>P.O. Box 8, Station B<br>Dayton, Ohio 45407 | \$ 42   | \$ 0  |

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

| <u>EPA Facility<br/>I.D. No.</u> | <u>Facility</u>   | <u>Closure Cost<br/>Est. as of<br/>May 19, 1982</u> | <u>Post-<br/>Closure Cost<br/>Est. as of<br/>May 19, 1982</u> |
|----------------------------------|---|---|---|
| (Dollars in Thousands)           |   |   |   |
| TX D 001700806                   | Monsanto Company<br>Chocolate Bayou Plant<br>Box 711<br>Alvin, TX 77511                                 | \$1,667   | \$1,104   |
| TX D 008079527                   | Monsanto Company<br>Texas City Plant<br>P. O. Box 1311<br>Texas City, TX 77590                          | 662   | 90  |
| FL D 000126169                   | Monsanto Company<br>Pensacola Plant<br>P. O. Box 12830<br>Pensacola, FL 32575                           | 3,224   | 0   |
| GA D 001700699                   | Monsanto Company<br>Augusta Georgia Plant<br>Marvin Griffin Road<br>P. O. Box 1473<br>Augusta, GA 30903 | 20  | 0   |

| EPA Facility<br>I.D. No. | Facility   | Closure Cost<br>Est. as of<br>May 19, 1982 | Post-<br>Closure Cost<br>Est. as of<br>May 19, 1982 |
|--------------------------|--|--|---|
|                          |  | (Dollars in Thousands)                     |   |
| SC D 000419069           | Monsanto Company<br>Greenwood Plant<br>P. O. Box 1057<br>Greenwood, SC 29646 | \$ 10                                      | \$ 0  |
| SC D 000419200           | Monsanto Company<br>Spartanburg Plant<br>Box 5397<br>Spartanburg, SC 29301   | 1  | 0   |

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility.

| EPA Facility<br>I.D. No. | Facility   | Closure Cost<br>Est. as of<br>May 19, 1982 | Post-<br>Closure Cost<br>Est. as of<br>May 19, 1982 |
|--------------------------|--|--|---|
|                          |  | (Dollars in Thousands)                     |   |
| AL D 004019048           | Monsanto Company<br>Anniston Plant<br>Highway 202<br>West 10th Street<br>Anniston, AL 36202          | \$ 340                                     | \$ 895  |
| AL D 006320774           | Monsanto Company<br>Decatur Plant<br>P. O. Box 2204<br>Decatur, AL 35602                             | 77   | 0   |
| AR D 001700657           | Monsanto Company<br>El Dorado Plant<br>P.O. Box 231<br>El Dorado, AR 71730                           | 99   | 32  |
| CA D 003938487           | Monsanto Company<br>Long Beach Plant<br>6251 Paramount Boulevard<br>Box 2919<br>Long Beach, CA 90801 | 2  | 0   |

| EPA Facility<br>I.D. No. | Facility   | Closure Cost<br>Est. as of<br>May 19, 1982<br>(Dollars in | Post-<br>Closure Cost<br>Est. as of<br>May 19, 1982<br>Thousands) |
|--------------------------|--|---|---|
| CA D 990802738           | Monsanto Company<br>Avon Plant<br>1777 Monsanto Way<br>Martinez, CA 94553  | \$ 11   | \$ 0  |
| CA O 063566517           | Monsanto Company<br>Oakmead Plant<br>Oakmead Industrial Court<br>3350 Scott Blvd., Bldg.1<br>Santa Clara, CA 95051 | 1   | 0   |
| MA D 990894172           | Monsanto Company<br>Everett Plant<br>Mystic View Road<br>Everett, MA 02149   | 5   | 0   |
| IA D 990782112           | Monsanto Company<br>Muscatine Plant<br>R.R. #5<br>Muscatine, IA 52761  | 624   | 0   |
| IL D 000802702           | Monsanto Company<br>W. G. Krummrich Plant<br>Route 3<br>Sauget, IL 62201   | 2,037   | 0   |
| MA D 041492406           | Monsanto Company<br>Bircham Bend Plant<br>190 Grochmal Avenue<br>Indian Orchard, MA 01151                          | 30  | 0   |
| MA D 001114818           | Monsanto Company<br>Springfield Plant<br>730 Worcester Street<br>Indian Orchard, MA 01151                          | 49  | 0   |
| TN D 00404814            | Monsanto Company<br>Columbia Plant<br>Columbia, TN 38401   | 33  | 250   |

Subsidiaries

|                |   |    |   |
|----------------|---|----|---|
| IA D 005287768 | Fisher Controls Int'l., Inc.<br>Marshalltown Division<br>Governor Road Plant<br>P. O. Box 190<br>Marshalltown, Iowa | 10 | 0 |
|----------------|---|----|---|

| EPA Facility<br>I.D. No. | Facility  | Closure Cost<br>Est. as of<br>May 19, 1982 | Post-<br>Closure Cost<br>Est. as of<br>May 19, 1982 |
|--------------------------|---|--|---|
|                          |   | (Dollars in                                | Thousands)  |
| NC D 042891481           | Monsanto Triangle Park<br>Development Center, Inc.<br>P. O. Box 12274<br>Res. Triangle Park, NC 27709 | \$ 35                                      | \$ 0  |

This owner or operator is required to file a Form 10-K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1981.


FINANCIAL TEST  
ALTERNATIVE I  
(Dollars in Millions)

|   |            |
|---|------------|
| 1. Sum of current closure and post-closure cost estimates   | \$ 21.2    |
| 2. Amount of annual aggregate liability coverage to be demonstrated   | \$ 8.0     |
| 3. Sum of lines 1 and 2   | \$ 29.2    |
| *4. Total liabilities (if any portion of your closure or post-closure costs estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6) | \$ 2,739.0 |
| *5. Tangible net worth  | \$ 3,298.2 |
| *6. Net worth   | \$ 3,330.2 |
| *7. Current assets  | \$ 2,549.5 |
| *8. Current liabilities   | \$ 1,063.9 |
| 9. Net working capital (line 7 minus line 8)  | \$ 1,485.6 |
| *10. The sum of net income plus depreciation, depletion, and amortization.  | \$ 806.2   |
| *11. Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)  | \$ 4,436.7 |



|   | <u>YES</u>    | <u>NO</u>     |
|---|---------------|---------------|
| 12. Is line 5 at least \$10 million?  | <u>X</u>      | <u>      </u> |
| 13. Is line 5 at least 6 times line 3?  | <u>X</u>      | <u>      </u> |
| 14. Is line 9 at least 6 times line 3?  | <u>X</u>      | <u>      </u> |
| *15. Are at least 90% of assets located in the U.S.?<br>If not, complete line 16. | <u>      </u> | <u>X</u>      |
| 16. Is line 11 at least 6 times line 3?   | <u>X</u>      | <u>      </u> |
| 17. Is line 4 divided by line 6 less than 2.0?                                    | <u>X</u>      | <u>      </u> |
| 18. Is line 10 divided by line 4 greater than 0.1?                                | <u>X</u>      | <u>      </u> |
| 19. Is line 7 divided by line 8 greater than 1.5?                                 | <u>X</u>      | <u>      </u> |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (g) as such regulations were constituted on the date shown immediately below.

  
 Francis A. Stroble  
 Vice President and  
 Chief Financial Officer  
 June 17, 1982

# Monsanto

Monsanto Chemical Company  
800 N. Lindbergh Boulevard  
St. Louis, Missouri 63167  
Phone: (314) 694-1000

June 29, 1988

Ms. Anita Boseman 5HS-113  
Region V EPA  
230 South Dearborn  
Chicago, IL 60604

Dear Ms. Boseman:

Re: Part B Call-In  
Monsanto Akron  
OHD-071-112-239

RECEIVED  
JUL 05 1988  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

In response to the referenced letter received from your office on May 6, 1988 and several telephone calls with you and Mr. Ed Kitchen of Ohio EPA, additional information on the status of the Monsanto Akron Research Facility is as follows:

1. Facility applied for a RCRA Part A permit and received notification with EPA I.D. #OHD071112239 on October 12, 1981.
2. The facility was inspected on December 2, 1982 by the Ohio EPA and found deficient in several areas. The facility was advised that it would not need a RCRA permit if it corrected the deficiencies and met several conditions, including submission of a closure plan for the storage area. A copy of the Ohio EPA inspection report dated December 22, 1982 is attached.
3. By letter dated January 21, 1983 (copy attached) the facility advised Ohio EPA that the deficiencies had been corrected, the storage area had been closed and certified clean, and the storage area would no longer be used for storage of RCRA waste.
4. Monsanto considers the storage area closed under interim status and since January 1983 the facility has operated with less than 90 day storage of hazardous waste.

Ms. Anita Boseman

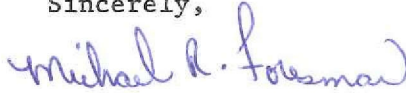
-2-

MRF  
6/29/88

The facility plans to continue as a small quantity generator with less than 90 day storage of hazardous waste.

If further information is needed, please advise.

Sincerely,



Michael R. Foresman  
Manager, Environmental Protection

/dg

Attachment

cc: Mr. Ed Kitchen - Ohio EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-13

15 APR 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Earl Guinn *Glen McKee*  
Monsanto Company  
Akron Market Research Center  
260 Springside Drive  
Akron, Ohio 44313

RE: Part B Call-in  
Akron Market Research Center  
OHD 071 112 239

Dear Mr. Guinn:

Some time ago, you should have received an acknowledgement of the United States Environmental Protection Agency's (U.S. EPA) receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act (RCRA) permit program. Accordingly, your facility is currently authorized with interim status under Section 3005(e) of RCRA. This letter constitutes the next step in the formal process leading toward issuance or denial of a RCRA permit. Under the authority of 40 CFR §270.10, this is a formal request for submittal of Part B of the permit application for the above-referenced facility. The Part B application is due six months from the date you receive this letter.

Enclosed is a copy of 40 CFR Part 270 which lists the items required for submitting the Part B permit application for your facility. A copy of the "Part B Completeness Checklist" is enclosed to help you in preparing a comprehensive and complete permit application.

If your facility chooses not to pursue a full RCRA permit, you may withdraw your intent to seek a permit by filing a closure plan with the U.S. EPA and Ohio Environmental Protection Agency (OEPA). Federal RCRA closure regulations (40 CFR Subpart G) require that you submit a closure plan to: George Hamper (5HS-13), Chief, Ohio Section, U.S. EPA - Region V, 230 South Dearborn Street, Chicago, Illinois 60604. Approval by both Agencies is necessary prior to commencement of any activities that are part of the closure plan.



Some facilities may be unable to comply with the financial responsibility requirements for liability coverage under 40 CFR §264.147. If your facility is unable to meet these requirements, or any other applicable requirements of 40 CFR Parts 270 or 264, then we must deny the permit for your facility. In that case, you would probably want to submit a closure plan under 40 CFR Subpart G rather than the completed Part B application.

If your facility never actually treated, stored, or disposed of hazardous waste under RCRA, then it may not be necessary to submit either a Part B application or a closure plan. However, you will have to submit a Part A withdrawal request for review. This request must demonstrate that your facility never actually qualified for interim status because either: 1) the waste was not a hazardous waste as defined in 40 CFR §261; 2) that there has been no treatment, storage, or disposal of the waste since November 19, 1980; or 3) that the hazardous waste management process was exempt from the permitting requirements of RCRA. For example, storage of waste generated on-site in containers or tanks less than 90 days is exempt from the permitting requirements of RCRA in accordance with 40 CFR §262.34. Likewise, treatment in a wastewater tank is exempt under 40 CFR §270.1(c)(2)(u). A withdrawal request must incorporate the signatory requirements contained in 40 CFR §270.11.

The Agency is committed to conducting the RCRA permitting process as efficiently as possible. Consequently, you may want to contact Ms. Anita Boseman of my staff, at (312) 353-4734, to discuss any questions or concerns you have regarding the preparation of the application. Ms. Boseman will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

Should you have any questions about confidentiality of information, please refer to the enclosed rules on confidentiality as set forth in 40 CFR Part 2 and 40 CFR §270.12 of RCRA. If you anticipate asserting a claim of confidentiality, please review the above-referenced enclosure regarding substantiation of confidentiality (§2.208) that sets forth the criteria that must be met for claiming confidentiality.



Please be reminded that submission of the Part B application must be made six months from the receipt date (i.e., date this letter is received). Upon completion of the application, please send two copies to the U.S. EPA and three copies to the OEPA. Please number each page of the application uniquely, including all attachments (maps, specifications, etc.). A certification statement identical to the one stated in 40 CFR §270.11(d) must accompany each application and all additional submittals. Send two copies of the application to the following address:

RCRA ACTIVITIES  
Part B Permit Application  
U.S. EPA, Region V  
Post Office Box A-3587  
Chicago, Illinois 60690-3587

Send three copies to: Thomas Crepeau  
Ohio Environmental Protection Agency  
Division of Solid & Hazardous Waste Management  
Post Office Box 1049  
Columbus, Ohio 43266-1049

Failure to furnish the complete Part B permit application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR §270.10. In addition, failure to answer this request may also result in subsequent enforcement action by the U.S. EPA.

Upon receiving the Part B application, the U.S. EPA will coordinate its review with the OEPA and will strive for the simultaneous issuance of Federal and State hazardous waste facility permits. It is possible that during the processing of the application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and OEPA, in lieu of U.S. EPA, will make the final determination on your permit application.

A copy of 40 CFR Part 264 is enclosed to help you in addressing the requirements and standards for the operation of treatment, storage and disposal facilities. These standards will become applicable to your facility upon issuance of a RCRA permit by U.S. EPA. A copy of the July 14, 1986, hazardous waste tank system regulatory amendments is also enclosed. These new rules establish technical standards and operating procedures for the owners and operators of tank systems that use tanks for accumulating, storing or treating hazardous waste. These rules may be applicable to your facility and are, therefore, enclosed for your information.



PS Form 3811, July 1983 447-845

**SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☒ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:  
 Glen L. McKee  
 Director of Technology  
 Rubber Chemicals Division  
 Monsanto Company  
 260 Springside Drive  
 Akron, Ohio 44313

4. Type of Service:
- |   |                                  |
|---|----------------------------------|
| <input type="checkbox"/> Registered           | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD     |
| <input type="checkbox"/> Express Mail         |                                  |

Article Number  
 P557 099 087

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee  
X
6. Signature - Agent  
X
7. Date of Delivery
8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

(5HS-13) Baseman

OHD 071.112.239

PS Form 3811, M

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address.  
 ↑(Extra charge)↑
2. ☐ Restricted Delivery  
 ↑(Extra charge)↑

3. Article Addressed to:

Carl Lewis  
 260 Springside Drive  
 Akron, OH 44313

RETURN TO SENDER  
 UNDELIVERED - NOT KNOWN

4. Article Number

P707063237

Type of Service:

- |   |                                  |
|---|----------------------------------|
| <input type="checkbox"/> Registered           | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD     |
| <input type="checkbox"/> Express Mail         |                                  |

Always obtain signature of addressee or agent and **DATE DELIVERED.**

8. Addressee's Address (ONLY if requested and fee paid)

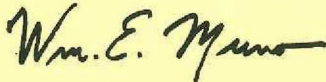
5. Signature - Addressee  
X
6. Signature - Agent  
X
7. Date of Delivery  
4/22/84

*[Signature]*

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (HSWA) were signed into law. This new law amends RCRA and contains many provisions which may affect your facility. Under the corrective action requirements of HSWA, your facility is required to correct all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that the corrective action requirements apply to all solid waste management units, not just the hazardous waste management units subject to the permitting requirements. Enclosed is a document entitled "Certification Regarding Potential Releases from Solid Waste Management Units." It is necessary for you to complete and submit this form with your Part B application to help address corrective action requirements. If you previously completed and submitted this form, and if the information is accurate and up-to-date, you may simply include a copy of your previous submittal in your Part B application.

This Agency looks forward to working with you toward fulfilling the above request. Again, should you have any questions concerning the above matter, please contact us for assistance.

Sincerely,



William E. Munro  
Acting Associate Division Director  
Office of RCRA

Enclosures: 40 CFR Part 270 (applicable parts)  
Part B Completeness Checklist  
40 CFR Part 2 (applicable parts)  
40 CFR Part 264 (applicable parts)  
Certification Regarding Potential Releases  
from Solid Waste Management Units

cc: Paul Flanigan, OEPA  
District Office Manager, OEPA  
Ed Lim, OEPA